

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court
Southern District Of Texas
FILED

UNITED STATES DISTRICT COURT

MAR 20 2019

for the
Southern District of Texas

David J. Bradley, Clerk

United States of America
v.
Pedro Sebastian ARREOLA, YOB: 1996
Jose Adrian ARREOLA, YOB: 2000
United States Citizens

Case No. M-19-0657 -M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 19, 2019 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

21 USC 952

Defendants did knowingly and intentionally import into the United States from the United Mexican States approximately 35.68 kilograms of methamphetamine, a Schedule II controlled substance

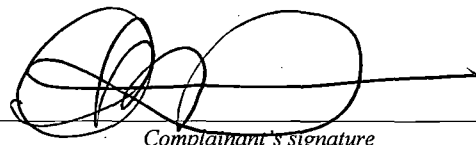
This criminal complaint is based on these facts:

Before the United States Magistrate Judge, Southern District of Texas, I, Christina Bergeron Flores, Special Agent, United States Immigration and Customs Enforcement, being duly sworn, depose and say the following:

See Attachment A

☒ Continued on the attached sheet.

Approved by Amy L. Greenbaum

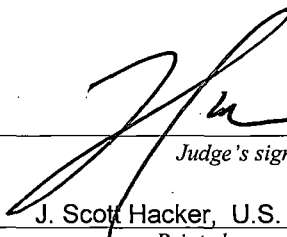


Complainant's signature

Christina Bergeron Flores, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/20/2019City and state: McAllen, Texas

Judge's signature

J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On March 19, 2019, U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in McAllen, Texas received a request for investigative assistance from the U.S. Customs and Border Protection/Office of Field Operations (CBP/OFO) at the Donna Port of Entry (POE) in Donna, Texas. Customs and Border Protection Officers (CBPOs) detained Pedro Sebastian ARREOLA (hereafter Pedro ARREOLA) and Jose Adrian ARREOLA (hereafter Jose ARREOLA) after discovering 39 packages containing a white crystalized substance, and weighing a total of 35.68 kilograms (kg), concealed within non-factory compartments in the spare tire of the vehicle Pedro ARREOLA was driving when applying for entry into the U.S.

At primary inspection, Pedro ARREOLA stated to CBPOs that he and Jose ARREOLA were traveling into the U.S. to obtain identification documents. CBPO referred the vehicle for a CBP Land Border inspection. During secondary inspection, a non-intrusive X-ray inspection (Z-portal) of the vehicle was conducted and discovered anomalies located in the spare tire area of the vehicle. CBPOs located a non-factory attachment under the vehicle. CBPOs recovered 39 packages of white crystalized substance concealed within the spare tire of the vehicle which field-tested positive for properties of methamphetamine.

HSI Special Agents and a HSI Task Force Officer (TFO) interviewed Pedro ARREOLA and Jose ARREOLA, post-Miranda Warning, regarding the purpose and details of their travels into the U.S. from Mexico. Pedro ARREOLA stated he and Jose ARREOLA were traveling into the U.S. to McAllen, Texas and then to Atlanta, Georgia to obtain obtain vehicle parts to be transported to Mexico at the direction of an unidentified individual. Pedro ARREOLA stated he and Jose ARREOLA have not had employment for a few months. Pedro ARREOLA and Jose ARREOLA made further statements inconsistent of each other and of communication recovered within cellular telephones found in their possessions.

During interview of Pedro ARREOLA, he stated the vehicle he was driving belongs to Jose ARREOLA. Pedro ARREOLA stated he was to be compensated by Jose ARREOLA \$500.00 to drive Jose ARREOLA to Atlanta, Georgia as Jose ARREOLA does not have a driver's license valid for U.S. travel. Pedro ARREOLA stated payment would be received by Jose ARREOLA by wire transfer.

During interview of Jose ARREOLA, he stated he and Pedro ARREOLA were traveling to the McAllen area. Once questioned by agents regarding their travel itinerary, Jose ARREOLA stated he and Pedro ARREOLA were traveling to Atlanta, Georgia. Jose ARREOLA stated the vehicle he was driving was recently purchased for Jose ARREOLA by unidentified individuals who hired Jose ARREOLA to transport vehicle parts from Atlanta, Georgia to Mexico. Jose ARREOLA stated the vehicle was registered in his name by unidentified individuals. Jose ARREOLA

stated he and his brother were to be paid approximately \$3,500.00 as compensation and travel costs for their travel to Atlanta, Georgia. Jose ARREOLA initially stated he had exclusive access and control of the vehicle registered in his name. Jose ARREOLA later recanted this statement explaining that one of the individuals, who hired Jose ARREOLA to travel to Atlanta, Georgia, took possession of the vehicle during the afternoon of March 18, 2019, and returned the vehicle to Jose ARREOLA during the morning of March 19, 2019. Jose ARREOLA stated the unidentified individual stated that he told Jose ARREOLA he was taking the vehicle to acquire fuel for Jose ARREOLA's trip; however, Jose ARREOLA stated the vehicle was returned to him low on levels of fuel. Agents questioned Jose ARREOLA regarding Jose ARREOLA providing contrary statements, to which Jose ARREOLA explained that he was concerned that agents would find fault with Jose ARREOLA regarding issue identified with the vehicle Pedro ARREOLA was driving.

A review of the cellular telephone found to be in Jose ARREOLA's possession revealed communication between Jose ARREOLA and an unidentified individual providing instruction for Jose ARREOLA's travel on March 19, 2019. This communication revealed direction by unknown individual on March 19, 2019, specifically to inspect the vehicle. Communication between Jose and Pedro ARREOLA indicates that currency was to be wired into Pedro ARREOLA's account by wire transfer contrary to both Jose ARREOLA and Pedro ARREOLA's statements.

Based on the telephone communications, the conflicting statements of the defendants, and the manner in which the narcotics were concealed, agents believe that the defendants knowingly and intentionally imported the methamphetamine into the United States from the United Mexican States.